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Attorneys for Plaintiff
Applications in Internet Time LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

APPLICATIONS IN INTERNET TIME, LLC,

Plaintiff,

v.

SALESFORCE.COM, INC.,

Defendant.

Civil Action No.: 3:13-CV-00628-RCJ-CLB

**DECLARATION OF ANDREA PACELLI
IN SUPPORT OF APPLICATIONS IN
INTERNET TIME, LLC'S OPENING
CLAIM CONSTRUCTION BRIEF**

1 I, Andrea Pacelli, declare:

2 1. I am of counsel at King & Wood Mallesons LLP, admitted to practice in the state of
3 New York and *pro hac vice* in this matter, and am one of the attorneys of record for Applications in
4 Internet Time, Inc. (“AIT”) in this case. I make this declaration based upon my personal knowledge
5 and am competent to testify as to the matters stated herein.

6 2. Attached as Exhibit A is a true and correct copy of United States Patent No.
7 7,356,482.

8 3. Attached as Exhibit B is a true and correct copy of United States Patent No.
9 7,356,482.

10 4. Attached as Exhibit C is a true and correct copy of those constructions that have been
11 agreed upon in this matter.

12 5. Attached as Exhibit D is a true and correct copy of an Office Action dated February
13 28, 2007, from the prosecution history of United States Patent Application No. 09/797,488.

14 6. Attached as Exhibit E is a true and correct copy of an Appeal Brief, dated August 28,
15 2007, from the prosecution history of United States Patent Application No. 09/797,488.

16 7. Attached as Exhibit F is a true and correct copy of the Declaration of Craig Rosenberg
17 re Claim Construction dated September 18, 2015.

18 8. Attached as Exhibit G is a true and correct copy of the Declaration of Benjamin B.
19 Bederson in support of Salesforce’s Responsive Claim Construction Brief dated October 16, 2015.

20 9. Attached as Exhibit H is a true and correct copy of the Reply Declaration of Craig
21 Rosenberg re Claim Construction dated October 30, 2015.

22 10. Attached as Exhibit I is a true and correct copy of the since vacated December 28,
23 2016 Final Written Decision of the Patent Trial and Appeal Board (“PTAB”) concerning inter partes
24 review proceedings with respect to the asserted patents.

25 11. Attached as Exhibit J is a true and correct copy of selected pages from the *Microsoft*
26 *Computer Dictionary* (4th Ed. 1999).

27 12. Attached as Exhibit K is a true and correct copy of *The American Heritage Dictionary*
28 *of the English Language* (4th Ed. 2000).

DECLARATION OF ANDREA PACELLI

1 13. Attached as Exhibit M is a true and correct copy of selected pages from the
2 Declaration of Mark E. Crovella, Ph.D, dated August 17, 2015.

3 14. Attached as Exhibit N is a true and correct copy of selected pages from Oracle,
4 *Oracle8i Data Warehousing Guide* (Release 2 (8.1.6) 1999).

5 15. Attached as Exhibit O is a true and correct copy of a Notice of Allowance, dated
6 November 6, 2007, from the prosecution of United States Patent Application No. 09/797,488.

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9 Dated: April 6, 2021

/s/ Andrea Pacelli

Andrea Pacelli